

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

V.

RICARDO ERNESTO GOMEZ (10)

RICARDO ERNESTO GOMEZ (10)

SEALED

No. 4:18CR204
Judge Mazzant

FILED

MAY - 8 2019

Clerk, U.S. District Court
Texas Eastern

SECOND SUPERSEDING INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 21 U.S.C. § 846 (Conspiracy to Possess with the Intent to Distribute Cocaine)

That from sometime in or about January 2016, and continuously thereafter up to and including April 10, 2019, in the Eastern District of Texas and elsewhere,

[illegible]


Ricardo Ernesto Gomez


defendant, did knowingly and intentionally combine, conspire, and agree with other persons known and unknown to the United States Grand Jury, to knowingly and intentionally possess with the intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

Count Two

Violation: 18 U.S.C. § 1956(h) and
1956(a)(2)(A) and (a)(2)(B)(i)
(Conspiracy to Commit Money
Laundering)

That from sometime in or about January 2016, and continuously thereafter up to and including April 10, 2019,


Ricardo Ernesto Gomez




defendants, knowingly combined, conspired, and agreed together and with each other and with other persons known and unknown to conduct financial transactions affecting interstate commerce which involved the proceeds of specified unlawful activity, that is conspiracy to distribute and possess with intent to distribute cocaine, as alleged in Count One of this Second Superseding Indictment;

1. knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of that specified unlawful activity contrary to 18 U.S.C. § 1956(a)(B)(i).

2. to knowingly transport, transmit, or transfer, or attempt to transport, transmit, or transfer a monetary instrument or funds from a place in the United States to or through a place outside the United States, or to a place in the United States from or through a place outside the United States, with intent to promote the carrying on of specified unlawful activity, that is, Conspiracy to Possess with the Intent to Distribute a Controlled Substance, to-wit: cocaine, as described in Count One of this Second Superseding Indictment, in violation of 18 U.S.C. § 1956(a)(2)(A); and

3. to knowingly transport, transmit, or transfer, or attempt to transport, transmit, or transfer a monetary instrument or funds from a place in the United States to or through a place outside the United States, or to a place in the United States from or through a place outside the United States, involving the proceeds of a specified unlawful activity, that is, Conspiracy to Possess with the Intent to Distribute a Controlled

Substances, to-wit: cocaine, as described in Count One of this Second Superseding Indictment, knowing that the monetary instrument or funds involved in the transportation, transmission, or transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, or transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(2)(B)(i).

All in violation of 18 U.S.C. § 1956(h).

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

As a result of committing the offense charged in this Second Superseding Indictment, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 982 and 21 U.S.C. § 853, all property used to commit or facilitate the offenses, proceeds from the offenses, and property derived from proceeds obtained directly or indirectly from the offenses, including but not limited to the following:

CURRENCY

1. \$80,000.00 in U.S. currency seized from [REDACTED]
2. \$169,974.00 in U.S. currency seized from [REDACTED]
3. \$23,435.00 in U.S. currency seized from [REDACTED]
4. \$3944.00 in U.S. currency seized from [REDACTED]
5. \$712.00 in U.S. currency seized from [REDACTED]

6. \$250,120.11 in U.S. currency seized from Wells Fargo Account xxxx-xx5717, as to [REDACTED]

JEWELRY

1. Assorted jewelry seized from 6723 Lazyridge Drive, San Antonio, Texas from [REDACTED]
2. Assorted jewelry seized from 1327 FM 1729, Lubbock, Texas from [REDACTED]
3. Assorted jewelry seized from 18805 CR 2300, Lubbock, Texas from [REDACTED]
4. Assorted jewelry seized from 1502 CR 3010, Lubbock, Texas from [REDACTED]
5. Assorted jewelry seized from 1502 CR 3010, Lubbock, Texas from [REDACTED]

VEHICLES

1. 2015 Cadillac Escalade, VIN # 1GYS4SKJ3FR668856, seized from [REDACTED]
2. 2015 Cadillac Escalade, VIN # 1GYS4NKJXFR580758, seized from [REDACTED]
3. 2014 Mercedes-Benz E350 Sedan, VIN # WDDHF5KB5EA983469, seized from [REDACTED]
4. 2018 GMC Acadia SLT2 SUV, VIN # 1GKKNNLS5JZ107583, seized from [REDACTED];

REAL PROPERTY

1. All that lot or parcel of land, together with buildings, improvements, fixtures, attachments and easements located at 6723 Lazyridge Drive, San Antonio, Texas, more

fully described as Lot 29, Block 5, New City Block 13661, Oak Hills Subdivision, Units 7 & 11, situated in the City of San Antonio, Bexar County, according to the map or plat thereof, recorded in Volume 5580, Page 52, Deed and Plat Records, Bexar County, Texas (Parcel ID 13661-005-0290) as to [REDACTED]

2. All that lot or parcel of land, together with buildings, improvements, fixtures, attachments and easements located at 18803 CR 2300, Lubbock, Texas, more fully described as Lots Ten (10) and Fifteen (15), SUNRISE RACHES, an Addition to Lubbock County, Texas, according to the mpa, plat and/or dedication deed thereof, recorded in Volume 6932, Page 124, Official Real Property Records, Lubbock County, Texas as to [REDACTED]

3. All that lot or parcel of land, together with buildings, improvements, fixtures, attachments and easements located at 18805 CR 2300, Lubbock, Texas, more fully described as:

FIELD NOTES on a 12.03 Acre Tract out of the 36.47 Acre Tract out of Section 23, Block E, E.L. and RR. Co. Survey, Lubbock County, Texas, recorded in Volume 6813, Page 121, Lubbock County Real Property Records, being further described by metes and bounds as follows:

BEGINNING at a found rod with red cap for the Southwest corner of this tract and the Northeast corner of Lot 1, Sunrise Raches an Addition, as recorded in Volume 6932, Page 124, Lubbock County Real Property Records, whence the Southwest corner of Section 23, Block E, Lubbock County, Texas, by said Plat calls bears S 00°13'05" W, 382.5 feet and S 89°49'54" W, 1641.81 feet;

THENCE N 88°18'57" W (Texas North Central Zone Bearing Basis) (Called S 89°59'55" W), along the North line of Lots 1 thru 10, Sunrise Ranches, 1269.09 feet to a found rod with red cap for the most Southerly Southwest corner of this tract;

THENCE N 01°46'43" E (Called N 00°05'50" E), along the East line of Lots 13 thru 15, Sunrise Ranches, 326.17 feet to a found rod with red cap for a corner of this tract;

THENCE N 88°19'24" W (Called S 89°59'45" W), 303.55 feet to a found rod with red cap for a corner of this tract;

THENCE with a curve to the left having a radius of 15.00 feet, with a chord bearing of S 46°48'28" W, a chord length of 21.16 feet to a found rod with red cap for a corner of this tract;

THENCE S 88°19'24" E, 308.51 feet to a set ½" rod with orange cap marked RPLS 4460 for a corner of this tract;

THENCE N 01°47'21" E, 48.88 feet to a set ½" rod with orange cap marked RPLS 4460 for the most Northerly Northwest corner of this tract;

THENCE S 86°18'57" E, 1279.99 feet to a set ½" rod with orange cap marked RPLS 4460 for the Northeast corner of this tract;

THENCE S 01°53'33" W, along the West line of the tracts described in Volume 5955, Page 233 and Volume 2367, Page 71, LCRPR, 405.13 feet to the PLACE of BEGINNING and containing 12.03 Acres including any Right-of-Way as to [REDACTED]

4. All that lot or parcel of land, together with buildings, improvements, fixtures, attachments and easements located at 1502 CR 3010, Lubbock, Texas, more fully described as:

A Tract of 3.264 acres out of the Southwest Quarter (1/4) of Section Seventy (70), Block A, Lubbock County, Texas and being more particularly described by Metes and Bounds as follows:

BEGINNING at a point 966.2 feet South and 366.0 feet East of a Railroad spike in the asphalt paving in the center of FM Highway No. 1729 which iron spike is the Northwest corner of the Southwest ¼ of Section 70, Block A, Lubbock County, Texas;

THENCE East 316.0 feet to a point for the Northeast corner of this tract;

THENCE South parallel to the West line of said Section 70, 450.0 feet to a point for the Southeast corner of this tract;

THENCE West, parallel to the North line of said Section 70, 316.0 feet to a point for the Southwest corner of this tract

THENCE North, parallel to the West line of said Section 70, 450.0 feet to the PLACE OF BEGINNING AND THE NORTHWEST CORNER OF THIS TRACT as to [REDACTED]

5. All that lot or parcel of land, together with buildings, improvements, fixtures, attachments and easements located at 1327 FM 1729, Lubbock, Texas, more fully described as:

1.095 acre tract out of Block A, Section 70 AB, Tract 11, Lubbock, Lubbock County, Texas according to the plat and/or dedication deed thereof recorded in the deed records of Lubbock County, Texas, and having a street address of 1327 FM 1729, Lubbock Lubbock County, Texas 79403 as to [REDACTED]

6. All that lot or parcel of land, together with buildings, improvements, fixtures, attachments and easements located at 1504 134th Street, Lubbock, Texas, more fully described as:

East 188 Feet of Lot 15 of the Winco Terrance Addition, County of Lubbock, State of Texas as to [REDACTED]

7. All that lot or parcel of land, together with buildings, improvements, fixtures, attachments and easements located at 1508 134th Street, Lubbock, Texas, more fully described as:

West 119 Feet of Lot 15 of the Winco Terrance Addition, County of Lubbock, State of Texas as to [REDACTED]

8. All that lot or parcel of land, together with buildings, improvements, fixtures, attachments and easements located at 2505 CR 7730, Lubbock, Texas, more fully described as:

Lot Twenty-Three (23), South Flint Estates, an Addition to the County of Lubbock, Lubbock County, Texas, according to the map, plat, and/or dedication deed thereof recorded in Volume 6668, Page 128 of the Deed Records of Lubbock County, Texas.

Personal Property: 16 X 75 Oakcreek mobile home located thereon as to Lots Ten (10) and Fifteen (15), SUNRISE RANCHES, as Addition to Lubbock County, Texas, according to the map, plat and/or dedication deed thereof, recorded in Volume 6932, Page 124, Official Real Property Records, Lubbock County, Texas as to [REDACTED]
[REDACTED]

9. All that lot or parcel of land, together with buildings, improvements, fixtures, attachments and easements located at 1418 CR 7760, Lubbock, Texas, more fully described as:

Lots Ten (10) and Fifteen (15), SUNRISE RANCHES, as Addition to Lubbock County, Texas, according to the map, plat and/or dedication deed thereof, recorded in Volume 6932, Page 124, Official Real Property Records, Lubbock County, Texas as to [REDACTED]
[REDACTED]

A TRUE BILL

GRAND JURY FOREPERSON

JOSEPH D. BROWN
UNITED STATES ATTORNEY

ERNEST GONZALEZ
Assistant United States Attorney

Date

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

V.

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RICARDO ERNESTO GOMEZ (10)

[REDACTED]

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SEALED

No. 4:18CR204

Judge Mazzant

**Count One**

Violation: 21 U.S.C. § 846

Penalty: If 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine -- not less than 10 years and not more than life imprisonment, a fine not to exceed \$10 million, or both; supervised release of at least five years.

Special Assessment: \$100.00

### Count Two

Violation: 18 U.S.C. § 1956 (h)

Penalty: Not more than 20 years imprisonment; a fine not to exceed \$250,000 or twice the pecuniary gain or loss, and a term of supervised release of not more than 3 years.

Special Assessment: \$100.00